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Attorneys for Defendant Erickson

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

CHAD LEROY ERICKSON,

Defendant.

Case No. 3:18-cr-00319-MO-6

**UNOPPOSED MOTION FOR AN
ORDER AUTHORIZING
DEFENSE COUNSEL TO FILE A
DECLARATION IN SUPPORT OF
DEFENDANT ERICKSON'S
MOTION TO CONTINUE TRIAL
DATE *EX PARTE* AND UNDER
SEAL**

COMES NOW Defendant, Chad Leroy Erickson, by and through his CJA-
appointed attorneys, Thomas K. Coan and Richard L. Wolf, and hereby moves this

court for an Order, authorizing Defendant Erickson's counsel to file any Declarations in support of his Motion to Continue the current trial date *ex parte* and under seal. Counsel for Defendant Erickson is drafting and intends to file such Motion by January 23, 2020.

Counsel for Defendant Erickson so move because any such Declaration will necessarily reveal confidential and/or otherwise privileged information regarding both the defendant and the work product of defense counsel in preparation of the defense case to date.

I have spoken with AUSA Leah Bolstad and informed her of our intention to seek such an Order and she has no objection thereto.

Respectfully submitted this 22nd day of January 2020.

s/ Richard L. Wolf

Richard L. Wolf, OSB #873719
Attorney for Defendant Erickson